

REMARKS

Claims 1-29 are pending in the application.

Claims 1-26 are rejected.

Claims 1-26 are rejected under 35 U.S.C. 103(a).

Claims 1, 5, 6, 10, 12, 15-17 and 26 are currently amended.

Claims 27-29 are new.

No new matter is added.

Claims 1-29 remain in the case for consideration.

Applicant requests reconsideration and allowance of the claims in light of the above amendments and following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Background of the Invention in view of U.S. Patent No. 6,552,426 to Ishio, et al., in view of Koopmans (6,706,557) and further in view of Lin (6,333,562).

Applicants respectfully traverse the rejections.

Claims 1 has been amended to be further distinguished from the Ishio reference. This claim recites that bonding pads on the lowest chip are interposed between the lowest chip and the insulating tape. These amended claims are further limited to an insulating tape that insulates bonding wires, which are connected between pads on a substrate to pads on the lowest chip, from contacting or connecting to any part of the top chip. In other words, the insulating tape prevents bonding wires from another chip from having any contact or connection to a chip on which the insulating tape is attached. The other independent claims have been amended to include corresponding limitations.

In contrast, Ishio fails to show bonding pads between the lowest chip and any insulating tape. Ishio shows a top chip (1) with an electrode pad (2) and a first insulation film (3) having a connection with a bonding wire (8) from another chip. In FIG. 1, pads (2) on a substrate (1) are not in a region between the chip and an insulating tape. Also, Ishio does not anticipate, teach, or make obvious claims 1, 10, 17 and 26 because the insulating film (3) does not insulate a first group of bonding wires (8) from contacting or connecting any part of the top chip (1).

For at least these reasons, the cited references, either alone or in combination, do not teach or suggest all of the limitations of claims 1, 10, 17 and 26. Accordingly, the rejection

does not present a *prima facie* case of obviousness, and the applicants submit that these claims are allowable.

Claims 2-9, 11-16 and 18-25 depend from their respective base claims 1, 10 and 17 and inherently include all of the limitations of their base claim. As discussed above, the prior art does not teach the limitations of the base claim much less the further embodiments of the dependent claims. Therefore, claims 2-9, 11-16 and 18-25 are allowable for their dependency and their own merits. Allowance of these claims is requested.

For the foregoing reasons, reconsideration and allowance of claims 1-29 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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